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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF NEVADA
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14 BOBBY D. SANCHEZ, VINTON
15 HAWLEY, JOHNNY WILLIAMS, JR.,
16 ROBERT JAMES, AND RALPH
17 BURNS,
18 Plaintiffs,

19 v.
20 BARBARA K. CEGAVSKE, IN HER
OFFICIAL CAPACITY AS
SECRETARY OF STATE FOR THE
STATE OF NEVADA, *et al.*,

21 Defendants.
22 _____ /

Case No.: 3:16-cv-00523-MMD-VPC

**NOTICE OF PROPOSED
SETTLEMENT AND REQUEST FOR
STAY PENDING APPROVAL BY
INVOLVED PUBLIC ENTITIES**

23 COMES NOW, Defendants, COUNTY OF MINERAL, a political subdivision of the
24 State of Nevada, along with its Board of Commissioners, NANCY BLACK, PAUL
25 MacBETH and JERRY TIPTON, and its Clerk-Treasurer CHRISTOPER NEPPER, in their
26 official capacities (hereinafter the "Mineral County Defendants"), by and through their
27 Attorneys of Record, ERICKSON, THORPE & SWAINSTON, LTD., BRENT L.
28 RYMAN, ESQ., and CHARITY F. FELTS, ESQ., and provides notice that counsel for the

1 parties have reached agreement on a proposed resolution of the instant action that will, if
 2 formally approved by the involved public entities, result in a stipulated dismissal with
 3 prejudice of Plaintiffs' claims. The terms of the settlement have been approved in principle
 4 by Plaintiffs. Since Defendants are public entities, however, the settlement remains
 5 contingent upon their formal approval. Counsel for Defendants has agreed to prepare a
 6 settlement agreement and release of all claims to be reviewed and approved by counsel and
 7 presented to the involved public entities in accordance with Nevada's Open Meeting Law as
 8 stated in NRS Chapter 241. The parties request that the Court stay this matter and hold all
 9 pending deadlines in abeyance for the period necessary to seek and obtain such approval.
 10 Undersigned counsel for the Mineral County Defendants respectfully requests a period of one
 11 month, or until January 9, 2017, to complete that process and will submit a status report when
 12 formal approval is achieved.

13 DATED this 9th day of December, 2016.

14 ERICKSON, THORPE & SWAINSTON, LTD.

16 /s/ Brent Ryman
 17 BRENT L. RYMAN, ESQ. (#008648)
 18 CHARITY F. FELTS, ESQ. (#010581)
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CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5, I certify that I am an employee of ERICKSON, THORPE & SWAINSTON, LTD. and that on this day I caused to be served a true and correct copy of the attached document by:

- U.S. Mail
- Facsimile Transmission
- Personal Service
- Messenger Service
- CMECF

addressed to the following:

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12 *Attorneys for Plaintiffs*

13 Adam Paul Laxalt, Esq.
14 Attorney General
15 Lori M. Story, Esq.
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19 *Attorneys for Defendant, Secretary of State*

17 Christopher J. Hicks, Esq.
18 Washoe County District Attorney
19 Michael W. Large, Esq.
20 Washoe County Deputy District Attorney
P.O. Box 11130
Reno, Nevada 89520
Attorneys for Washoe County Defendants

DATED this 9th day of December, 2016.

/s/ Brent Ryman
Brent Ryman